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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

WFTLV01, LLC, a Nevada limited liability
 company

Plaintiff

v.

SECURITY NATIONAL INSURANCE
 COMPANY, a Delaware corporation.

Defendant.

Case 2:20-cv-01845-JCM-BNW

**STIPULATION AND ORDER
 EXTENDING TIME FOR PLAINTIFF
 TO RESPOND TO DEFENDANT'S
 MOTION TO DISMISS (ECF No. 21)**

[First Request]

IT IS STIPULATED by and between the Plaintiff and Defendant, through their
 respective counsel, and pursuant to LR IA 6-1 and LR 7-1, that the time for Plaintiff to respond
 to Defendant' Motion To Dismiss (ECF No. 21) may be extended to December 21, 2020. This is
 the parties' first request regarding a response to said motion. The parties agree and respectfully
 submit that good cause exists for this stipulation based on the following:

1 1. Plaintiffs filed their Complaint in Clark County District Court on August 17,
2 2020. (ECF No. 1-2).

3 2. AmTrust North America, Inc. (“AmTrust”) was served through its registered
4 agent on September 2, 2020. (ECF No. 1-3).

5 3. Defendants removed the action to the above-titled court on October 2, 2020 (ECF
6 No. 1).

7 4. On September 30, 2020, defendant Security National Insurance Company
8 (“Security National”) was served through the Nevada Division of Insurance.

9 5. Thereafter, the parties engaged in several good faith conferences to discuss the
10 issues, parties and posture of the action. To facilitate these discussions and preserve judicial
11 resources, the parties agreed to several extensions for Defendants to respond to the Complaint.
12 The parties’ discussions were productive and, as result, the parties were able to narrow and
13 resolve some issues and procedural matters. These accomplishments were reflected in several
14 subsequent stipulations, including stipulations ECF No. 11 on October 16, 2020, dismissing
15 defendant AmTrust without prejudice, and ECF No. 19 on November 4, 2020, dismissing
16 plaintiffs WFTLV02, LLC; WFTLV03, LLC; WFTLV04, LLC; and WFTLV05, LLC after the
17 parties agreed such plaintiffs were not necessary parties.

18 6. On November 4, 2020, defendant Security National filed a motion to exceed page
19 limits (ECF No. 18) relative to its anticipated motion to dismiss.

20 7. On November 6, 2020, defendant Security National filed its Motion to Dismiss
21 (EFC No. 21).

22 8. Plaintiff requires additional time to response to Security National’s Motion to
23 Dismiss (ECF No. 21) because such motion and the matters implicated in this case are
24 considerable, novel issues of law arising from the COVID-19 pandemic and related civil orders
25 that are implicated by this matter. Many of the issues raised in Security National’s Motion to
26 Dismiss have not been addressed by either the Ninth Circuit or the Nevada appellate courts.

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9. Plaintiff also requires additional time to respond due to its counsel's family medical issues, which recently developed.

10. Therefore, the parties stipulate and agree that Plaintiff may have until December 21, 2020 to respond to Defendant's Motion to Dismiss (ECF No. 21).

11. This is the parties' first request for extension relative to responding to Defendant's Motion to Dismiss (ECF No. 21).

12. This stipulation is made on good faith and for good cause, and not for any purpose to delay.

13. The parties further agree that this stipulated extension of time does not operate as any admission or waiver of any claim or defense by Plaintiffs or Defendants.

Dated: November 19, 2020

KENNEDY & COUVILLIER, PLLC

LEWIS BRISBOIS BISGAARD & SMITH
LLP

/s/Maximiliano D. Couvillier III, Esq.

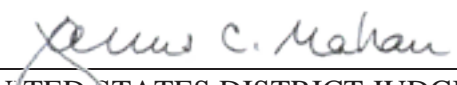
/s/Jeffrey D. Olster

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ORDER

IT IS SO ORDERED.


UNITED STATES DISTRICT JUDGE

Dated: November 30, 2020